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February 25, 2008

Received & Inspected

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FCC Mail Room

VIA ECFS

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

Re: Annual Customer Proprietary Network Information Compliance  
Certification; EB Docket No. 06-36

Dear Ms. Dortch:

Please find the attached Annual Customer Proprietary Network Information  
("CPNI") Compliance Certification for Hotline Inc. Please feel free to call me if you have any  
questions regarding this filing.

Sincerely,



Katherine Barker Marshall

Attachment

No. of Copies rec'd 0 + 2  
List ABCDE

**Annual Customer Proprietary Network Information Certification**  
**Pursuant to 47 C.F.R. § 64.2009(e)**  
**EB Docket No. 06-36**  
**February 25, 2008**

**Hotline Inc.**  
**0011174570**  
**Mitchell Zafrani**  
**President**

I, Mitchell Zafrani, certify that I am an officer of Hotline, Inc., and acting as an agent of Company, that I have personal knowledge that Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how Company's procedures ensure the company is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules.

Company has not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year. Company has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.*, through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

  
\_\_\_\_\_  
**Mitchell Zafrani**  
**President**  
**Hotline Inc.**

Date: 2/20/08

## **Customer Proprietary Network Information Certification Attachment A**

Company has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules, as modified by the Commission in 2007.

### **Safeguarding against pretexting**

- Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. Company is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

### **Training and discipline**

- Company trains its supervisory and non-supervisory personnel twice a year in an effort to ensure that its employees, in accordance with FCC regulations: (a) understand what CPNI is, (b) join in and carry-out Company's obligation to protect CPNI, (c) understand when they are and when they are not authorized to use or disclose CPNI, and (d) keep records regarding any use of CPNI and customer complaints regarding CPNI.
- Company employees are required to review Company's CPNI practices and procedures set forth in training materials and the Company's CPNI policy and to acknowledge their comprehension thereof.

### **Company's use of CPNI**

- Hotline Inc. does not use CPNI for any purpose. Hotline Inc. does not share CPNI with affiliates or third parties for marketing purposes. Hotline Inc. may engage third parties to assist in billing and collections, administration, surveys, marketing, service delivery and customization, maintenance and operations, and fraud prevention.
- Under section 222 and the Commission's CPNI rules, Company may use CPNI for the following purposes:
  - To initiate, render, maintain, repair, bill and collect for services;
  - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
- Company does not disclose or permit access to CPNI to track customers that call competing service providers.
- Company discloses and permits access to CPNI where required by law (e.g., under a lawfully issued subpoena).

### **Additional safeguards**

- Company does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.
- Company has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- Company designates one or more officers, as an agent or agents of the company, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- Company will provide written notice to the Commission in accordance with the requirements of FCC rule 64.2009(f) if ever its opt-out mechanisms malfunction in the manner described therein.
- For customer-initiated telephone inquiries regarding or requiring access to CPNI, Company authenticates the customer (or its authorized representative), through a pre-established password, without prompting through the use of readily available biographical or account information. If the customer cannot provide a password, then Company only discloses call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record.
- The Company does not offer on-line access to customer accounts.
- Company discloses CPNI to customers at Company's retail locations if the customer first presents a valid photo ID matching the customer's account information for purposes of discussing payment history only.
- Company notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
- The Company does not provide service to business customers at this time. However, if in the future, Company offers services to business customers, the Company may negotiate alternative authentication procedures for services that Company provides to business customers that have both a dedicated account representative and a contract that specifically addresses Company's protection of CPNI.
- In the event of a breach of CPNI, Company has practices and procedures in place to notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs Company to delay notification, or Company and the investigatory party agree to an earlier notification. Company will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.
- Company does not provide CPNI to independent contractors or joint venture partners.